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Public Comments on Wireless E911 Location Accuracy Requirements:=====

Title: Wireless E911 Location Accuracy Requirements

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Submitter Info:

First Name: Mordy

Last Name: Kaplinsky

Mailing Address: 850 Eastern Parkway

City: Brooklyn

Country: United States

State or Province: NY

ZIP/Postal Code: 11213

Email Address: mordy@navanu.com

Organization Name: Navanu Technologies

Comment: I fully concur with the need and ever increasing importance of a reliable and accurate indoor positioning technology, as this is a matter of life and it is a moral responsibility that cannot be ignored. That said this mandate needs to be implemented in a manner that learns the lessons from our history of E-911 implementation and encourages a solution that will stick and evolve.

Some lessons I suggest:

1. Any mandate needs to figure out how to get this technological capability without adding immense new financial burdens on the networks to support this technology, such as TruePosition's tech which has a significant installation and ongoing support costs. This ongoing cost with no commercial benefits will obviously always be perceived by the carrier's as a financial and regulatory burden which will increase resistance from the carriers and negatively affect the amount of effort put into it and its reliability, as the recent data from the degradation in the general E-911 reliability data in California attests.

2. Instead of demanding that carrier's not be allowed to make commercial use from location finding systems subsidized by 911 allocated funds, they should be encouraged to find alternative revenue generating uses. This approach will require the FCC to rethink and be flexible on various currently "accepted" practices, by rethinking things like privacy and being more flexible on the approach while not compromising on the acceptable standards.

In short: It is my belief that for the long term success and ongoing improvements of both indoor and outdoor E-911 capabilities and reliability, the carriers need a strong and common sense mandate but also need an incentive to continually maintain and improve on the mandate, by perceiving it as an opportunity instead of a liability.

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